

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF NORTH CAROLINA  
ASHEVILLE DIVISION

**FILED**  
ASHEVILLE, NC

JUN 7 2016

U.S. DISTRICT COURT  
WESTERN DISTRICT OF NC

UNITED STATES OF AMERICA

v.

JOSEPH HAROLD PATTERSON

DOCKET NO. 1:16-cr-67

BILL OF INDICTMENT

Violations:

18 U.S.C. § 13

18 U.S.C. § 2244(a)(3)

18 U.S.C. § 2423(a)

NCGS § 14-190.9

NCGS § 14-190.16

NCGS § 14-202.1

THE GRAND JURY CHARGES:

COUNT ONE

(Transportation of a Minor to Engage in Sexual Activity)

On or about June 27, 2011 within the Western District of North Carolina and elsewhere,

**JOSEPH HAROLD PATTERSON**

did knowingly transport B.J., M.O., and W.H., in interstate commerce, with the intent that B.J., M.O., and W.H. engage in any sexual activity for which any person can be charged with a criminal offense. *who are under the age of 18, were*

All in violation of Title 18, United States Code, Section 2423(a).

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## **COUNT TWO**

(Abusive Sexual Contact)

From between on or about June 27, 2011 and June 30, 2011, in Swain County, in the Great Smoky Mountains National Park, within the special maritime and territorial jurisdiction of the United States, and within the Western District of North Carolina and elsewhere,

**JOSEPH HAROLD PATTERSON**

did knowingly engage in sexual contact and cause sexual contact, to wit, encouraging and causing B.J., M.O., and W.H., to intentionally and directly touch their genitals in his presence, B.J., M.O., and W.H., being persons who had attained the age of 12 years but had not attained the age of 16 years and they were at least four years younger than defendant.

All in violation of Title 18, United States Code, Section 2244(a)(3).

## **COUNT THREE**

(Taking Indecent Liberties with Children)

From between on or about June 27, 2011 and June 30, 2011, in Swain County, in the Great Smoky Mountains National Park, within the special maritime and territorial jurisdiction of the United States, and within the Western District of North Carolina and elsewhere,

**JOSEPH HAROLD PATTERSON**

did willfully take and attempt to take any immoral, improper, and indecent liberty with B.J., M.O., and W.H., children under the age of sixteen years, for the purpose of arousing and gratifying sexual desire. Defendant being more than sixteen years of age and more than five years older than B.J., M.O., and W.H.

All in violation of Title 18, United States Code, Section 13 and North Carolina General Statute Section 14-202.1.

## **COUNT FOUR**

(First Degree Sexual Exploitation of a Minor)

From between on or about June 27, 2011 and June 30, 2011, in Swain County, in the Great Smoky Mountains National Park, within the special maritime and territorial jurisdiction of the United States, and within the Western District of North Carolina and elsewhere,

**JOSEPH HAROLD PATTERSON**

knowing the character of the content and material and performance, did use, employ, induce, coerce, encourage, and facilitate a minor and minors to engage in sexual activity for a live performance.

All in violation of Title 18, United States Code, Section 13 and North Carolina General Statute Section 14-190.16.

## **COUNT FIVE**

(Indecent Exposure)

From between on or about June 27, 2011 and June 30, 2011, in Swain County, in the Great Smoky Mountains National Park, within the special maritime and territorial jurisdiction of the United States, and within the Western District of North Carolina and elsewhere,

**JOSEPH HAROLD PATTERSON**

did willfully expose the private parts of his person in any public place in the presence of a person and persons less than sixteen years of age for the purpose of arousing and gratifying sexual desire.

All in violation of Title 18, United States Code, Section 13 and North Carolina General Statute Section 14-190.9.

A TRUE BILL:

JILL WESTMORELAND ROSE  
UNITED STATES ATTORNEY



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DAVID A. THORNELOE  
ASSISTANT UNITED STATES ATTORNEY